UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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JAN 2 1 2014

Ref: 8EPR-N

Ms. Tami Paulsen
Missoula District Ranger
24 Fort Missoula Road
Missoula, MT 59804

Re: Montana Snowbowl Expansion Draft Record of Decision and Final Environmental Impact Statement, CEQ # 20130362

Dear Ms. Paulsen:

The U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the Draft Record of Decision (ROD) and Final Environmental Impact Statement (EIS) for the Montana Snowbowl Expansion, prepared by the USDA Forest Service (USFS). Our comments are provided for your consideration pursuant to our responsibilities and authority under Section 102(2)(C) of the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4332(2)(C), and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609. Section 309 of the Clean Air Act directs the EPA to review and comment in writing on the environmental impacts of any major federal agency action.

Project Background

The Montana Snowbowl Ski and Summer Resort (MSB) is located on both private and federal land approximately 12 miles north of Missoula, Montana. The Lolo National Forest (LNF) proposes to approve a Special Use Permit for the expansion of the MSB to TV Mountain. This proposed expansion includes adding new ski trails on 166 additional acres, 4 additional lifts, an additional snowmaking reservoir, two wastewater drainfields, a day lodge, skier shelter and maintenance shop, buried utility lines, and hiking and mountain bike trails. There are several proposed connected actions on private lands associated with the project.

Comments

The EPA Region 8 Montana office provided extensive comments on the scoping of this project as well as the Draft EIS (in a letter dated April 20, 2011). The EPA rated the Draft EIS as "Environmental Concerns – Inadequate Information" (EC-2). We appreciate that a number of revisions were made in the Final EIS to address our comments. As explained below, we still have some concern about the potential impact to the Butler Creek's water quality and overwintering fish habitat.

Butler Creek Water Quality

The EPA continues to have concerns about the potential sediment impacts to water quality, whether from runoff or operations such as snowplowing. A number of connect actions to be implemented on private land are mentioned in the Final EIS and are included in the cumulative impact analysis of the proposed action. One is the installation of the sediment filter above the Butler Creek outfall. Also, although not listed as a connected action in Final EIS Chapter 2, reshaping of the main parking lot to more effectively manage runoff is described in the Final EIS (page 2-11 and 4-3 as connected action). These actions are important components that will help keep sediment out of Butler Creek and prevent further degradation of water quality and aquatic habitat. We recommend the USFS include these requirements in the land use permit in order to protect water quality in Butler Creek as it flows onto public lands downstream of MSB.

As stated in the Final EIS, installation of the sediment filter and monitoring station may increase sediment in the creek over a short time period. Thus, timing the work to minimize the impact on aquatic life from the increased sediment runoff will be important. We recommend adding a requirement in the ROD related to timing for the sediment filter and flow monitor installation so as to minimize the potential negative impact.

Additionally, the Final EIS states that "Some sediment contained in plowed snow may continue to reach [the] channel in areas with no natural or installed filter." Although the snowplowing is occurring on private land, there is a direct impact of this action to the stream conditions on public land. More specific requirements in addition to the general term and condition listed in the Draft ROD, Appendix A #7, may be valuable. We recommend the USFS require MSB to avoid plowing snow from roads and parking areas into locations that would drain directly into streams, wetlands, and riparian areas resulting in increased stream sedimentation during snow melt periods.

Fish Habitat and Stream Flow

As mentioned in the Final EIS, the westslope cutthroat trout is present and the bull trout (a threatened species) was historically present in Butler Creek downstream of MSB. The Final EIS recognizes that there is already an adverse impact to the overwintering fish habitat in Butler Creek. The EPA supports the new minimum 30 gallon per minute (gpm) flow requirement for Butler Creek. This will help to ensure that sufficient water is provided to protect overwintering habitat in the creek. The success of this mitigation is in the details for which we offer the following comments.

The Final EIS and Draft ROD provide conflicting information on the frequency of the required stream flow monitoring and reporting to the LNF. The Final EIS description of the alternative (page 2–18) and Draft ROD Appendix A (# 4n) indicate that the monitoring will be conducted daily during the "winter season," presumably from October through March. The results would be reported weekly to the LNF. Final EIS Table 2-2 (page 2–25) and Draft ROD Table 4 indicate that monitoring will occur weekly and be reported annually to the LNF. Draft Rod Appendix A includes terms and conditions that "have been incorporated into [the draft] decision...and will be implemented accordingly." The Draft ROD further states that "if the weekly monitoring reports show that the 30 gpm minimum is not being met, MSB will modify their withdrawal immediately and report this to LNF within seven days."

We recommend that the ROD clarify the period of monitoring, and the frequency of the monitoring and reporting. Since maintaining a 30 gpm flow is critical to maintaining a flow that will support the winter fish habitat, we recommend that the monitoring be conducted daily during periods of water withdrawal which could start as early as October and go through March. This will allow the MSB operators to effectively "modify" their withdrawal rate and assure adequate minimum flow for fisheries. Also, given that the LNF will make the determination that the withdrawals are protective of trout habitat (page 4-58), it would be more efficient if the reporting of the water flow monitoring is provided weekly to the LNF.

In addition, neither the Final EIS nor Draft ROD specifies the locations or method of this monitoring. To assure the adequate flow is provided, we suggest that monitoring be located just downstream of the withdrawal point, and a reliable method that is easy to read during winter months be outlined in the ROD. This will facilitate the daily reading and recording of the stream flow.

We support the USFS commitment to protect natural resources. We hope our comments on the Final EIS and Draft ROD provide insight to where the final ROD can provide improve clarity and strengthen protection of these resources. If you have any questions or would like to discuss our comments, please contact me at (303) 312-6704. You may also contact Lisa Lloyd, NEPA lead reviewer, at (303) 312-6537 or by email at lloyd.lisa@epa.gov.

Sincerely,

Philip S. Strobel
Acting Director, NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation

cc: Paul Matter, District Ranger, USFS